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7 *Las Vegas Metropolitan Police Department*
Officer Kenshin Rose
8 *Officer Zoe Pappas*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 ***

12 DEYANNIA SHIPP,

13 Plaintiff,

14 vs.

15 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, OFFICER K. ROSE,
16 OFFICER Z. PAPPAS, DOLLAR TREE,
INC., and DOES 1 through 10, inclusive,
17

18 Defendants.

CASE NO. 2:24-cv-02062-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES AND
CONTINUE TRIAL**

[FIRST REQUEST]

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20 Pursuant to LR IA 6-1 and LR 26-3, the parties, by and through their respective counsel of
21 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
22 by ninety-one (91) days, up to and including Monday, October 27, 2025. In addition, the parties
23 request that all other future deadlines contemplated by the Discovery Plan and Scheduling Order
24 be extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as
25 follows:

- 26 1. On November 4, 2024, Plaintiff filed his Complaint in the United States District
27 Court, Nevada. (ECF No. 1).

2. On January 27, 2025, Defendants Las Vegas Metropolitan Police Department and Officers Z. Pappas, and K. Rose (“Metro Defendants”) filed their Answer to Plaintiff’s Complaint. (ECF No. 15).
3. On January 27, 2025, Defendant Dollar Tree, Inc., (“Dollar Tree”) filed its Answer to Plaintiff’s Complaint. (ECF No. 18).
4. On March 13, 2025, the Court entered the Discovery Plan and Scheduling Order. (ECF No. 24).
5. On March 24, 2025, Metro Defendants served their Initial FRCP 26 Disclosures.
6. On May 2, 2025, Metro Defendants served their First Supplement to FRCP 26 Disclosures.
7. On March 12, 2025 Dollar Tree served their Initial FRCP 26 Disclosures.
8. On May 1, 2025, Plaintiff served her Initial FRCP 26 Disclosures.

DISCOVERY REMAINING

1. Defendants will take the deposition of Plaintiff.
2. Plaintiff will take the deposition of Defendants.
3. Defendants will collect any and all relevant medical and/or mental health records and/or billing related to the allegations contained in Plaintiff’s Complaint.
4. Defendants may depose Plaintiff’s medical and/or mental health providers once able to collect any and all relevant medical and/or mental health records and billing.
5. Defendants may depose Plaintiff’s expert witnesses.
6. The parties may depose any and all other witnesses identified through discovery.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The parties aver, pursuant to Local Rule 26-3, that good cause exists for the requested extension. This Request for an extension of time is not sought to delay the proceedings or for any improper purpose.

Counsel for Metro Defendants Counsel for Defendants was in the process of preparing for Trial in the matter entitled, *Calderon v. USAAS* Case No. 2:20-cv-1049-CDS-EJY, which was recently reset. Counsel for CNLV Defendants is and was also preparing for 3 mediations and/or

1 settlement conferences in the matters entitled Alvarez-Rodriguez v. Las Vegas Metropolitan
 2 Police Department, Case No. 2:24-cv-00230-JAD-NJK, Bowman v. Las Vegas Metropolitan
 3 Police Department, Case No. 2:22-cv-01481-ART-NJK, and Tayvion Posey v. Las Vegas
 4 Metropolitan Police Department, Case No. 2:23-cv-01936-GMN-MDC.

5 In addition, Counsel for Dollar Tree has been preparing for 2 Arbitration Hearings in
 6 Smith v Lowe's JAMS No: 5260000688 and Green v Dollar Tree, A-24 – 894667-C, Additionally,
 7 Counsel was involved in a settlement conference for State v Perez C-24-385245-3.

8 Counsel for Plaintiff has also been preparing for two upcoming trials (*Maura Medina v.*
 9 *Bar Bakers, LLC, et al.*, Orange County Superior Court, Case No. 30-2020-01152775-CU-WT-
 10 CJC set to begin May 23, 2025; *Michael Adams v. Shlomo Mieri, et al.*, Los Angeles Superior
 11 Court, Case No. 20STCV31625 set to begin June 2, 2025). Plaintiff's counsel is also currently
 12 preparing to submit a Ninth Circuit appellate brief in *Ronnie Parham v. City of West Covina, et*
 13 *al.*, Case No. 24-5202, which is due on May 16, 2025.

14 The parties require additional time to complete case depositions. For those reasons, the
 15 parties respectfully request an extension of the discovery deadlines in this matter.

16 Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3 governs
 17 modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or
 18 motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than
 19 twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR
 20 26-3.

21 This is the first request for extension of time in this matter. The parties respectfully submit
 22 that the reasons set forth above constitute compelling reasons for the extension.

23 The following is a list of the current discovery deadlines and the parties' proposed
 24 extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>Monday, July 28, 2025</i>	<i>Monday, October 27, 2025</i>
Deadline to Amend Pleadings or Add Parties	<i>Tuesday, April 29, 2025</i>	<i>Tuesday, July 29, 2025</i>

Scheduled Event	Current Deadline	Proposed Deadline
Expert Disclosure pursuant to FRCP26 (a)(2)	Thursday, May 29, 2025	Thursday, August 28, 2025
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	Monday, June 30, 2025	Monday, September 29, 2025
Dispositive Motions	Wednesday, August 27, 2025	Wednesday, November 26, 2025
Joint Pretrial Order	Friday, September 26, 2025	Friday, December 26, 2025 <i>If dispositive motions are pending, the parties will submit their Joint Pretrial Order within thirty (30) days of the Court's order as to any dispositive motions.</i>

WHEREFORE, the parties respectfully request this Court extend the discovery period by ninety-one (91) days from the current deadline of July 28, 2025, up to and including October 27, 2025, and extend the other dates as outlined in accordance with the table above.

IT IS SO STIPULATED.

DATED the 2nd day of May, 2025.

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DATED the 2nd day of May, 2025.

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/s/ Robert W. Freeman

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DATED the 2nd day of May, 2025.

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8
9 **ORDER**

10 IT IS SO ORDERED.

11 Dated this 2nd day of May, 2025.

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14 UNITED STATES MAGISTRATE JUDGE
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